IN THE UNITED STATES DISTRICT COURT UNITED STATES COURTS HOUSTON DIVISION

MAR 2 & 2006 MARY VIRGINIA CAMPBELL,

MICHAEL M. MELBY, GLERK OF COURT Plaintiff,

CIVIL ACTION NO. H-05-0872 V. **JURY DEMANDED BRIDGESTONE (USA), INC.,**

BRIDGESTONE/FIRESTONE, INC., **BRIDGESTONE/FIRESTONE NORTH** AMERICAN TIRES, L.L.C., **BRIDGESTONE CORPORATION and** § 8888 **BRIDGESTONE AMERICAS** HOLDING, INC.,

Defendants.

NOTICE OF SETTLEMENT and UNOPPOSED MOTION FOR LEAVE OF COURT TO FILE AMENDED COMPLAINT TO JOIN ADDITIONAL PLAINTIFFS

COMES NOW, MARY VIRGINIA CAMPBELL, Plaintiff, herein by his undersigned counsel, and moves for Leave of Court to File an Amended Complaint in this cause of action and states as follows:

I.

The parties in the lawsuit have agreed to settle their dispute after a mediation that took place on March 21, 2006. In order to fully memorialize the resolution of this matter, Plaintiff's husband, Robert Leonard Campbell, Jr., and their minor son, Robert Leonard Campbell II, need to be included in this action. Attached as Exhibit "A" is Plaintiff's Second Amended Original Complaint, which identifies the additional plaintiffs.

II.

Plaintiff has conferred with Defendants, and they are in agreement to the joining of additional parties.

WHEREFORE PREMISES CONSIDERED, Plaintiff respectfully requests that this Court grant Plaintiff leave to file the attached Second Amended Original Complaint.

Respectfully Submitted,

Shane R. Kadlec

Admissions I.D. No. #23728 Texas Bar No. 00796856

Attorney in Charge for Plaintiff

CERTIFICATE OF CONFERENCE

I hereby certify that this Motion was discussed opposing counsel and that all parties are unopposed to this Motion.

Shane R Kadlec

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been delivered unto all interested parties, by and through their Attorney of Record, in accordance with RULE 5, F.R.C.P. on March 24, 2006.

Shane R. Kadlec